

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

DEONTE JAMES,)	CASE NO. 1:21-cv-01958
)	
Plaintiff,)	JUDGE J. PHILIP CALABRESE
)	
vs.)	
)	
CUYAHOGA COUNTY, <i>et al.</i> ,)	
)	
Defendants)	

JOINT STATUS REPORT

Pursuant to the Court's Order, dated April 7, 2023 (Doc.#56), Plaintiff, Deonte James, and Defendant, Cuyahoga County, acting by and through counsel, hereby submit the following Joint Status Report, which the Court requested for the purpose of "identifying any discovery issues that require the Court's attention" at the upcoming status conference scheduled for Tuesday, May 16, 2023, at 4:30 pm. (Doc.#56, Order, pg. 2, PageID#1442).

In accordance with this Order, the Parties report that there are no outstanding discovery issues that require the Court's attention at the Status Conference. Since the Hearing on April 6, 2023, the Court has issued two rulings: (1) awarding reasonable expenses, including attorney fees, under Rule 37(a)(5), that were incurred in making the motion to compel discovery, and requesting the submission of lodestar information by May 17, 2023, and a response by May 31, 2023, (Doc.#57) and (2) referring the case to Mediation, which is now scheduled for June 28, 2023 (Doc.#58 and #59). Under the circumstances, counsel for the Parties do not believe that a Status Conference regarding discovery is necessary at this time, and jointly request

that the Court continue the Status Conference to a date in July after the upcoming Mediation.

In the alternative, if the Court wants to proceed with the Status Conference on May 16th, counsel for Defendant requests that the Court change the Status Conference from an in-person conference to a Zoom status conference.

Respectfully submitted,

/s/ Jessica S. Savoie
Ashlie Case Sletvold (0079477)
Jessica S. Savoie (0099330)
PEIFFER, WOLF, CARR, KANE
CONWAY & WISE, LLP
6370 SOM Center Road, Suite 108
Cleveland, Ohio 44139
(216) 589-9280
asletvold@peifferwolf.com
jsavoie@peifferwolf.com

Counsel for Plaintiff Deonte James

/s/ Stephen W. Funk
Stephen W. Funk (0058506)
ROETZEL & ANDRESS, LPA
222 S. Main Street, Suite 400
Akron, Ohio 44308
Telephone: 330.849.6602
E-mail: sfunk@ralaw.com

*Attorneys for Defendant-Appellant,
Cuyahoga County*

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of May, 2023, the foregoing Joint Status Report was electronically filed with the Court. Notice of this filing and access to this filing was served upon all counsel of record by the Court's electronic filing system.

/s/ Stephen W. Funk